THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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In re:	Chapter 11
FTX TRADING LTD., et al.,[1]	Case No. 22-11068 (JTD)
Debtors.	(Jointly Administered) **Ref Nos. 28225 & 29350**

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US BANKRUPTCY COURT
DISTRICT OF DELAWARE

Response to Debtors' Omnibus Objection to Claim No. 23712 (ECF No. 25698)

Claimant Jonas Paasch respectfully submits this response to the honorable Court. The claim arises from Quoine Pte Ltd's (now Liquid Global/FTX Japan) failure to release Ethereum Classic (ETC)[2] split[3] assets, property rightfully accruing to holders of Ethereum at the time, which happened prior to the FTX bankruptcy. (1.) The creditor class of ETC claimants appears to have been overlooked when bulk-processing 187 claims (ECF No. 25698) despite a maximum of 100 is permitted per FRBP 3007(e)(6), and omitting from equal treatment in violation of 11 U.S.C. §1123(a)(4).
(2.) Possibly, originally Quoine only ignored ETC because it was uncertain if and when it was going to start[4]   (3.) The claimant shows misleading and exceptional procedural circumstances causing delay and hindered participation.
1. Claimant's ownership of ETC, intentionally acquired through holding Ethereum, at the split, is generally evident as a consequence of holding Ethereum at the time. However he was left solely with the depreciated ETH post-fork, with no corresponding ETC credit.

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[1] TIN ending on 3288 (4063 for Almeda Research LLC). List of entities: cases.ra.kroll.com/FTX
[2] ETC is a hard fork of Ethereum that was traded at a significant percentage of the price. - Split's like ETC are initially acquired through the cost and loss or risk of holding the full before the split happens. (Hard forks are undisputable property (like Paypal stock once split from eBay in 2015 creating an equal amount of Paypal stocks). Moreover hard forks are fully decentralized and automatic: Both halves of a hard-forked network run copies of the same database and stay accessible through the same cryptographic keys ('passwords') for unlimited time. (Both halves are still the exact same property, also called wallet.)
[3] "Due to the developing interest in ETC (Ether Classic or ETHC), we at Gemini would like to keep you informed of our ongoing work to best address the implications of the Ethereum "Hard Fork" which occurred on July 20, 2016 at 13:20:40 UTC"
gemini.com/blog/ether-classic-and-the-ethereum-hard-fork
"This separate blockchain, with its corresponding cryptocurrency ether classic (ETC), quickly drew significant attention. Its tokens started trading at roughly 13:44 UTC for a price of $0.75 on 24th July, and ultimately surged close to 300% within the first 72 hours, reaching $2.85 on 26th July."
coindesk.com/markets/2016/12/23/classic-and-the-dao-what-drove-ether-prices-in-2016
[4] It was added late by some exchanges, as it started to "stay immutable" and partially deny that Ethereum undid a major heist (en.wikipedia.org/wiki/The_DAO), which took several percent of all ETH, so that keeping ETC–or being deprived of the choice to sell–included financing that heist ("attacker has withdrawn all ETC from DarkDAO on the unforked chain". Yet it instantly defined the crypto market (see volume *Ex. H*) and stayed valuable. *web.archive.org/web/20250325003844/https://www.reddit.com/r/ethereum/comments/4ukefq/attacker_has_withdrawn_all_etc_from_darkdao_on*).

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With no disclosure, policy or notification[5]. The Omnibus Objection refers to the deprived zero balance (only). (Presumably unaware that Quoine withheld visibility of ETC balances) and it overlooked the claimant's proofs: The timely claim No. 23712 (July 2023) includes documentation of ETC ownership arising directly from the ETH balance at the fork: The Claimant acquired ETC through transacting a lot of Ethereum within the right weeks (*see proof in the claim or Ex. A*), but no ETC balance was accounted for (*see proof in the claim or Ex. B*) (FTX claims form didn't provide a message/comment field, so that the claimant assumed that the reader would be aware of his class, which appears to affect all Quoine customers, who held ETH at the time, or ask back. Nonetheless claimant still contacted the three companies several times to make sure, yet faced several persistent issues (*see 3.*)

2. Quoine's concealment and defects

a) Hidden, undisclosed ETC Balances: While claimant's total amount bought was necessarily half of the transacted volume[6] (Ex. A) (about 13793 ETH, his final ETC property must be a few times less, since he bought and sold a few times within those days. When the hard fork happened, his amount of Ethereum was about 2840 to the claimant's memory. (He has an exceptional memory for important numbers. Partly proven at 2d)

b) Persistently obstructive Website and nonfunctional records: When trying to prove and calculate the exact hidden ETC balance through accessing Quoine's transaction history, the website wasn't reliable and imposed unreasonable issues. It was too unreliable despite repeated efforts over multiple years requiring thousands of clicks. (While trying to navigate the short transaction-history, it is spread across hundreds of pages (**Ex. C**). Claimant's actual transactions fit on several pages, yet the records are filled with too many extra lines computing minimal interest rates (**Ex. C2**) and filter options are not working. (Numerous attempts to click to the end of these pages failed with un-resumable progress and the page number is not part of the URL.)

– a) and b) are an effective barrier for creditors to see or verify their amount. (The export function will also only show the total amounts *as visible in the claim and Ex A.*)

c) Despite the claimant requesting ETC[7], the exchange failed to respond. Once Quoine sent a notice of already delisting ETC, the claimant discovered, that Quoine worked with ETC after all, so he contacted them again[8], yet this time the reactions were unaware (only) or evasive: "*I wasn't here back then, and not many of the people that were here in 2016 are still here*" (May 24, 2022) and "*I dont see that your ETC has been stolen*"

d) Minimum verified amount: Eventually the claimant was able to access relevant internal transaction IDs. Confirming that he purchased a balance of at least 598.9995 Ethereum prior to the fork (**Ex. D**) and held it at the exact split date (see footnote 2)

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[5] Exchanges usually notify (footnote 3). Long-term Ethereum investors at Quoine might never have noticed the ETC hard-fork and concealment of their ETC Balances.

[6] (Since his total transacted volume includes selling all that was bought in the end.)

[7] "*Please allow a one time withdrawal of ETC. It is a very relevant amount of money to me! Thank you!*" (*Jul 24, 2016*)

[8] "*Dear Quoine, I had a lot of Ethereum in your wallet when ETC (ETH Hard-fork) started…*" (*Mar 28, 2022*)

– Next to Quoine's concealment, the following procedural issues materially impaired the claimant's ability to assert his rights, rendering his chances of participation minuscule.

3. Procedural barriers

a) The "NOTICE TO ALL FTX CUSTOMERS" (Jul 14, 2023) only referenced Quoine and Liquid after about 650 words. (Making it likely to miss or be filtered)

b) Claimant filed timely but **didn't receive his claim ID from Kroll.** Neither by e-Mail nor postal letter. Mullane v. Cent. Hanover Bank & Tr. Co., 339 U.S. 306, 314 (1950) held: "An elementary and fundamental requirement of due process . . . is notice reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections."

c) Instead, weeks later, claimants' contact information was leaked from Kroll and the claimant promptly received "Kroll" and "FTX" imposter scams **(Ex. F)**, which further discouraged/reduced participation.

d) The FTX claims form had no comment/message field or range field and allowed a single attachment of "support documentation", forcing the claimant to rely on follow-up communication, stating his contact, "Other Crypto" and the remembered balance 2800.000000000 rounded for manual verification. The claimant was expecting to be answered or asked back in time, as of the design of the form and since it was not possible to hold ETC at Quoine in 2022 and resorted to repeated email request:

e) The claimant contacted Kroll, FTX and Quoine (now Liquid) dozens of times to no avail **(Ex. E),** while the recipients referred to each other in circles. He repeatedly stated to them that (1.) he wondered when, if and how he would get any confirmation. And that (2.) he wanted to make sure his specific claim would be interpreted correctly or else elaborate it (several times prior to the omnibus objection); However:

f) Failure to issue the claim confirmation and ID prevented meaningful reaction: It took until 2025 to finally achieve knowledge of the claim ID 23712 from Kroll. Then the claimant started researching the docket and noticed the Omnibus Objection.

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4. Relief sought: Claimant respectfully requests that the Court
  (A) grant recovery calculated equally to FTX claim's valuation (11 U.S.C. §1123(a)(4))
  (B) compel full discovery / Rule 2004 examination as necessary, ("Mutual
      knowledge of all the relevant facts... is essential to proper litigation." *Hickman v. Taylor*, 329 U.S. 495, 507 (1947)); or grant pro rata shares in Quoine.
  (C) grant such other relief as the Court deems just and appropriate
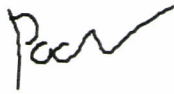
5. Applying FTX' uniform USD-based claim metric: FTX accounts' original USD value is estimated through the volume weighted average prices on the bankruptcy date (see ECF no. 5202). Today's value of an FTX claim is about 142.5%[9] of that, since partial appreciation is added, equal to a uniform compensation of 44.02% of today's value

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[9] https://web.archive.org/web/20250323155850/https://claims-market.com/ (145%+140%)/2

(Today's Crypto Market Cap. $2650B[10] divided by Nov. 11th, 2022's $855.8B[11] equals 3.097x). Since FTX claims' value does not differentiate which[12] specific assets each creditor held, it equals: USD_price_at_the_date_of_deprivation [13] × crypto_market-appreciation_since × 44.02%, so that mirroring FTX recovery, one initial ETC at fork time represents about $216.73 per[14] (Considering 44.02% appreciation. In analogous valuation to FTX claims $1.91365 × 257.28 × ~44.02%)

Respectfully submitted April 16th, 2025,

[signature]

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[10] https://web.archive.org/web/20250330213836/https://coinmarketcap.com/charts/

[11] https://web.archive.org/web/20221111225214/https://coinmarketcap.com/

[12] among about 350 persisting "Cryptocurrencies and Tokens". Including top (performing) projects, meme-coins and others alike (Example: SOL is priced several times more today, YFII several times less today) (ECF no. 5202-2 Ex. 1 "Digital Assets Conversion Table") basing their recovery valuations on luck as an inevitable side effect of the method.
 (So while ETH, which the claimant and the majority of ETH investors prefer[4] also outperformed the crypto market and ETC also underperformed later, neither can be assumed here, yet by at the FTX bankruptcy date, ETC remained a top 25 crypto currency, so that here, the mirrored calculation happens to be an almost fair amount in between (While more time passed, neither ETH nor ETC deviated from the market as part of the "Cryptocurrencies and Tokens" considered through the "Digital Assets Conversion Table")
[13] At first sight an easy calculation might seem to be based on ETC's price at the FTX bankruptcy date, yet the date of deprivation is different, so that FTX' bankruptcy date would not only be arbitrary to apply but break calculation uniformity to FTX' claims', through applying a specific crypto's appreciation prior to the bankruptcy. Thus considering the date of Quoine's ETC deprivation is necessary for analogous calculation mirroring the method for FTX creditors' recovery.
[14] An initial ETC at fork time was about $1.91365 (Ex. G).
And the Crypto Market Cap. was $10.3B on and appreciated 257.28x since July 25th 2016 (web.archive.org/web/20160725181027/https://coinmarketcap.com/ aswell as on July 18th 2016 (web.archive.org/web/20160718225437/http://coinmarketcap.com/)

CERTIFICATE OF SERVICE

I, Jonas Paasch, hereby certify that on this 25th day of April, 2025, a true and correct copy of the ~~RECEIVED~~ foregoing document was served upon the following individuals by the methods indicated:

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CLERK
US BANKRUPTCY COURT
DISTRICT OF DELAWARE
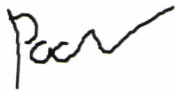
(1) By registered mail upon:

Clerk of the Court
United States Bankruptcy Court
District of Delaware
824 Market Street, 3rd Floor
Wilmington, DE 19801

(2) By email upon the following parties:

- Debtors' Counsel
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Exhibit A (also in claim 23712): Ethereum trade activity

Exhibit B (also in claim 23712): "No" ETC transactions

Exhibit C: Website Errors

Transactions

ETH ▼   Clear filters   Filters ▼

No data available
There is currently no data available. Please check again later.

Transactions

ETH ▼   Clear filters   Filters ▼

Trading		Deposit & Withdrawal		Others	
Trade	☑	Withdrawal	☐	Quick Exchange	☐
Exchange Fee	☐	Withdrawal Fee	☐	Repayment	☐
Trade Fee R/B	☐	Funding	☐	Loan	☐
Cross Currency Trade	☐	Funding Fee	☐	Interest Payment Fee	☐

There is currently

ETH ▼   Clear filters   Filters ▼

ID	Direction	Type	Amount	Created (YY/MM/DD)

Page : **1** →

Exhibit C2: Website with excessive, unavoidable verbosity:

	Balance	Deposits	Withdrawals	Open Orders	Transactions	Report
4304666	Outgoing		Sold	0.001336 BTC		16/07/11 05:01:01
4304664	Outgoing		Sold	0.02007166 BTC		16/07/11 05:01:01
4304663	Outgoing		Sold	0.02671999 BTC		16/07/11 05:01:00
4304658	Outgoing		Interest Transfer	0.00000534 BTC		16/07/11 05:01:00
4304657	Incoming		Loan	0.02671999 BTC		16/07/11 05:01:00
4304656	Outgoing		Interest Transfer	0.00000027 BTC		16/07/11 05:01:00
4304654	Incoming		Loan	0.001336 BTC		16/07/11 05:00:59
4304653	Outgoing		Sold	0.006688 BTC		16/07/11 05:00:59
4304649	Outgoing		Interest Transfer	0.0000373 BTC		16/07/11 05:00:58
4304648	Incoming		Loan	0.18652298 BTC		16/07/11 05:00:58
4304646	Outgoing		Interest Transfer	0.00021661 BTC		16/07/11 05:00:57
4304645	Incoming		Loan	1.08302937 BTC		16/07/11 05:00:57
4304642	Outgoing		Interest Transfer	0.0001786 BTC		16/07/11 05:00:57
4304641	Incoming		Loan	0.89299337 BTC		16/07/11 05:00:57
4304639	Outgoing		Interest Transfer	0.00000349 BTC		16/07/11 05:00:56

|← ← Page : **401** →

Note: Newly created model are not added if you are not in page 1

Exhibit D: All Chronologic Quione transaction IDs
(according to the broken website in 2025.)

4304303 Incoming	Bought	0.00002693	ETH	16/07/11 04:49:09
4304299 Incoming	Bought	0.00002693	ETH	16/07/11 04:48:54
4304294 Incoming	Bought	0.00002693	ETH	16/07/11 04:48:38
4304289 Incoming	Bought	0.00002693	ETH	16/07/11 04:48:24
4304282 Incoming	Bought	0.00002693	ETH	16/07/11 04:48:14
4304275 Incoming	Bought	0.00002693	ETH	16/07/11 04:48:06
4304270 Incoming	Bought	0.00002693	ETH	16/07/11 04:47:57
4304260 Incoming	Bought	0.00002693	ETH	16/07/11 04:47:45
4304152 Incoming	**Bought 21.92**	ETH	16/07/11 04:41:51	
4304150 Incoming	Bought	0.08	ETH	16/07/11 04:41:51
4304129 Incoming	**Bought 19.92**	ETH	16/07/11 04:41:03	
4304127 Incoming	Bought	0.08	ETH	16/07/11 04:41:02
4304060 Incoming	**Bought 75.25621307**	ETH	16/07/11 04:39:04	
4304058 Incoming	**Bought 24.74378693**	ETH	16/07/11 04:39:03	
4304524 Incoming	Bought	0.08	ETH	16/07/11 04:59:05
4304519 Incoming	Bought	1.59999966	ETH	16/07/11 04:58:49
4304516 Incoming	Bought	0.08	ETH	16/07/11 04:58:48
4304508 Incoming	Bought	1.59999966	ETH	16/07/11 04:58:34
4304504 Incoming	Bought	0.08	ETH	16/07/11 04:58:34
4304492 Incoming	Bought	1.59999966	ETH	16/07/11 04:58:14
4304491 Incoming	Bought	0.08	ETH	16/07/11 04:58:14
4304483 Incoming	Bought	1.59999966	ETH	16/07/11 04:57:55
4304481 Incoming	Bought	0.08	ETH	16/07/11 04:57:55
4304429 Incoming	**Bought 99.74047182**	ETH	16/07/11 04:54:00	
4304427 Incoming	Bought	0.25952818	ETH	16/07/11 04:53:59
4304383 Incoming	**Bought 121.9609436**	ETH	16/07/11 04:53:10	
4304381 Incoming	Bought	0.03905636	ETH	16/07/11 04:53:08
4304348 Incoming	Bought	0.00002693	ETH	16/07/11 04:51:28
4304336 Incoming	Bought	0.00002693	ETH	16/07/11 04:51:14
4304333 Incoming	Bought	0.00002693	ETH	16/07/11 04:50:59
4304330 Incoming	Bought	0.00002693	ETH	16/07/11 04:50:44
4304327 Incoming	Bought	0.00002693	ETH	16/07/11 04:50:31
4304323 Incoming	Bought	0.00002693	ETH	16/07/11 04:50:18
4304318 Incoming	Bought	0.00002693	ETH	16/07/11 04:50:00
4304315 Incoming	Bought	0.00002693	ETH	16/07/11 04:49:56
4304312 Incoming	Bought	0.00002693	ETH	16/07/11 04:49:42
4304308 Incoming	Bought	0.00002693	ETH	16/07/11 04:49:25
4304676 Incoming	Bought	1.04	ETH	16/07/11 05:01:06
4304673 Incoming	Bought	1.04	ETH	16/07/11 05:01:05
4304669 Incoming	Bought	1.36	ETH	16/07/11 05:01:03
4304665 Incoming	Bought	0.08	ETH	16/07/11 05:01:01
4304662 Incoming	Bought	1.59999966	ETH	16/07/11 05:01:00
4304661 Incoming	Bought	1.1997405	ETH	16/07/11 05:01:00
4304652 Incoming	Bought	0.4	ETH	16/07/11 05:00:58
4304616 Incoming	Bought	1.59999966	ETH	16/07/11 05:00:45
4304613 Incoming	Bought	0.08	ETH	16/07/11 05:00:45
4304606 Incoming	Bought	1.59999966	ETH	16/07/11 05:00:28
4304603 Incoming	Bought	0.08	ETH	16/07/11 05:00:28
4304596 Incoming	Bought	1.59999966	ETH	16/07/11 05:00:22
4304591 Incoming	Bought	0.08	ETH	16/07/11 05:00:21
4304586 Incoming	Bought	1.59999966	ETH	16/07/11 05:00:17
4304581 Incoming	Bought	0.08	ETH	16/07/11 05:00:16
4304573 Incoming	Bought	1.59999966	ETH	16/07/11 05:00:07
4304574 Incoming	Bought	0.08	ETH	16/07/11 05:00:07
4304565 Incoming	Bought	1.59999966	ETH	16/07/11 04:59:47
4304560 Incoming	Bought	0.08	ETH	16/07/11 04:59:46

4304555	Incoming	Bought	1.59999966		ETH	16/07/11 04:59:31
4304553	Incoming	Bought	0.08	ETH	16/07/11 04:59:31
4304543	Incoming	Bought	1.59999966		ETH	16/07/11 04:59:21
4304538	Incoming	Bought	0.08	ETH	16/07/11 04:59:21
4304529	Incoming	Bought	1.59999966		ETH	16/07/11 04:59:05
4304989	Incoming	Bought	2.88	ETH	16/07/11 05:11:22
4304980	Incoming	Bought	0.08	ETH	16/07/11 05:11:08
4304978	Incoming	Bought	2.88	ETH	16/07/11 05:11:08
4304962	Incoming	Bought	0.08	ETH	16/07/11 05:10:46
4304957	Incoming	Bought	2.88	ETH	16/07/11 05:10:44
4304951	Incoming	Bought	0.08	ETH	16/07/11 05:10:23
4304938	Incoming	Bought	0.08	ETH	16/07/11 05:10:02
4304928	Incoming	Bought	0.08	ETH	16/07/11 05:08:44
4304920	Incoming	Bought	0.08	ETH	16/07/11 05:08:25
4304905	Incoming	Bought	1.04316884		ETH	16/07/11 05:08:07
4304900	Incoming	Bought	0.08	ETH	16/07/11 05:08:05
4304894	Incoming	Bought	0.08	ETH	16/07/11 05:07:46
4304754	Incoming	Bought	0.08	ETH	16/07/11 05:02:08
4304753	Incoming	Bought	0.08	ETH	16/07/11 05:02:07
4304750	Incoming	Bought	1.51999966		ETH	16/07/11 05:02:06
4304740	Incoming	Bought	2.72	ETH	16/07/11 05:02:03
4304735	Incoming	Bought	1.04	ETH	16/07/11 05:02:00
4304714	Incoming	Bought	2.72	ETH	16/07/11 05:01:38
4304710	Incoming	Bought	1.59999966		ETH	16/07/11 05:01:37
4304704	Incoming	Bought	0.08	ETH	16/07/11 05:01:36
4304693	Incoming	Bought	1.59999966		ETH	16/07/11 05:01:17
4304687	Incoming	Bought	0.08	ETH	16/07/11 05:01:16
4304680	Incoming	**Bought**	**11.1224195**		ETH	16/07/11 05:01:09
4304678	Incoming	**Bought**	**117.83784**		ETH	16/07/11 05:01:07
4775471	Incoming	Bought	2	ETH	16/07/20 08:32:52
4775469	Incoming	Bought	0.56	ETH	16/07/20 08:32:52
4775467	Incoming	**Bought**	**2.32**	ETH	16/07/20 08:32:52
4775465	Incoming	Bought	1.84	ETH	16/07/20 08:32:52
4775463	Incoming	Bought	0.16	ETH	16/07/20 08:32:51
4775411	Incoming	**Bought**	**2.16**	ETH	16/07/20 08:32:11
4775409	Incoming	Bought	1.12	ETH	16/07/20 08:32:10
4775407	Incoming	Bought	2	ETH	16/07/20 08:32:10
4775405	Incoming	Bought	10	ETH	16/07/20 08:32:09
4775403	Incoming	Bought	10	ETH	16/07/20 08:32:09
4775401	Incoming	Bought	0.56	ETH	16/07/20 08:32:09
4775399	Incoming	**Bought**	**2.32**	ETH	16/07/20 08:32:08
4775393	Incoming	Bought	1.84	ETH	16/07/20 08:32:07
4775387	Incoming	Bought	10	ETH	16/07/20 08:32:07
4499675	Incoming	Bought	7	ETH	16/07/15 10:06:59
4492645	Incoming	Bought	1	ETH	16/07/15 09:35:47
4492616	Incoming	**Bought**	**3.20533348**		ETH	16/07/15 09:35:39
4492613	Incoming	Bought	1.79466652		ETH	16/07/15 09:35:39
4305022	Incoming	Bought	1.94793816		ETH	16/07/11 05:11:55
4305014	Incoming	Bought	0.08	ETH	16/07/11 05:11:41
4305013	Incoming	**Bought**	**4.64841404**		ETH	16/07/11 05:11:41
4305004	Incoming	Bought	2.88	ETH	16/07/11 05:11:39
4304994	Incoming	Bought	0.08	ETH	16/07/11 05:11:23
4775643	Incoming	**Bought**	**98**	ETH	16/07/20 08:46:38
4775515	Incoming	Bought	1.84	ETH	16/07/20 08:33:38
4775513	Incoming	Bought	0.16	ETH	16/07/20 08:33:38
4775475	Incoming	Bought	7	ETH	16/07/20 08:32:53
4775473	Incoming	Bought	1.12	ETH	16/07/20 08:32:52
4318621	Outgoing	**Sold**	**122**	ETH	16/07/11 13:15:49
4304390	Outgoing	Sold	0.00048474	ETH	16/07/11 04:53:25